addresses of the source and destination computers for the conduits in each firewall will be different. If these addresses are manually entered, errors can easily arise. To reduce the possibility of such errors, the claims recite a template-driven approach to the configuration of the network devices. With this approach, the same set of basic commands are applied to each device. However, within each set of commands, the variable data, e.g. the addresses of the source and destination computers in the case of firewall configuration, is selected from a database. As a result, each address only needs to be entered once, as a record in the database, rather than be repeated each time a new device is to be configured. The likelihood of errors is thereby significantly reduced.

The Belknap patent is not directed to the same objectives as the present invention, and consequently does not teach the claimed features to a person of ordinary skill in the art. More particularly, the Belknap patent is not concerned with the provisioning of a plurality of network devices. Rather, it discloses a common interface that can be employed to access a number of different media devices. The patent addresses a situation in which different ones of the media devices may have different sets of commands for retrieving media objects. To address this problem, the Belknap patent discloses a media manager that receives high level commands from a requesting application, and converts them into device-specific commands that are appropriate to the particular media device that is capable of servicing the requests.

Because the Belknap patent is directed to an objective which is entirely different from that of the present invention, it is respectfully submitted that it does not disclose the claimed subject matter to a person of ordinary skill in the art. For

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example, claim 1 recites a memory storing a template which contains a sequence of commands for configuring each of a plurality of devices of a given type. The claim further recites that each command that refers to a particular device "contains a variable as the identification of the device." In rejecting claim 1, the Office Action refers to the Belknap patent at column 2, line 65, to column 3, line 25. However, this portion of the patent does not contain any disclosure relating to the use of a template for storing a sequence of commands, particularly one in which each command that refers to a particular device contains a variable as the identification of the device. Rather, this portion of the patent merely discloses that a received high-level command is directed to a module associated with the device that will service that command, where it is mapped to a device-level command. The patent does not disclose the manner in which the command is generated in the first place. In particular, it does not disclose the use of a template in which variables are used to identify specific devices.

A second element recited in claim 1 is a database storing a record which indicates the respective network address of "each specific device for which a given device is to be configured." In the example given previously, a firewall (the given device) is to be configured with the addresses of the source and destination computers (the specific devices). The Belknap patent does not disclose a database containing this type of information. As noted previously, the Belknap patent is not concerned with the *configuration* of network devices. Rather, it is directed to the servicing of media requests from an application. As such, there is no reason to store configuration information in a database, within the system of the Belknap patent.

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The third element recited in claim 1 is an interface that is responsive to a command to configure a given device, for retrieving the template and the stored record associated with that device. The interface functions to substitute the network addresses in the retrieved record for the variables in the template, and to issue commands in accordance with this information. Again, the Belknap patent does not contain any disclosure relating to this claimed subject matter. First, as noted above, it is not concerned with the configuration of network devices, and therefore does not disclose an interface that is responsive "to a command to configure a given device." Nor does it disclose that, in response to a received command, an interface retrieves a template and a stored record associated with a particular device. Furthermore, it does not disclose the operation of "substituting. . . network addresses in the retrieved record for . . . variables in said template."

For at least these reasons, therefore, it is respectfully submitted that the Belknap patent does not anticipate the subject matter of claim 1. For the same reasons, the subject matter of claim 8 is likewise not anticipated. If the rejection of these claims is not withdrawn, the Examiner is requested to identify, with particularity, how the Belknap patent can be interpreted to disclose the claimed (1) template, (2) database storing addresses for which a device is to be configured, and (3) substitution of addresses in the database record for variables in the template. In the absence of such a showing, it is respectfully submitted that the rejection cannot be maintained.

In addition to the foregoing differences, other distinguishing features of the invention are recited in the dependent claims. A detailed discussion of these other

distinctions is believed to be unnecessary at this time, in view of the fundamental nature of the differences identified above.
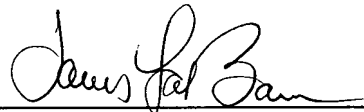
Claims 1-14 were provisionally rejected on the basis of obviousness-type double patenting, in view of claims 1-23 of copending Application No. 09/843,815. Since the rejection is provisional, no action on the part of Applicant is believed to be required at this time. If necessary, a terminal disclaimer will be submitted upon resolution of all other grounds of rejection and passing of the copending application to issue (MPEP 804).

Reconsideration and withdrawal of the rejections, and allowance of all pending claims are respectfully requested.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

Date: February 22, 2005   By: _____

                                           James A. LaBarre
                                           Registration No. 28,632

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620

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